

**STATE OF CALIFORNIA
TELECOMMUNICATIONS ACCESS FOR THE DEAF AND DISABLED
ADMINISTRATIVE COMMITTEE
505 14TH STREET, SUITE 400 OAKLAND, CA 94612**

December 13, 2005

Mr. Steve Larson
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Mr. Larson:

This letter is pursuant to direction from the Telecommunications Access for the Deaf and Disabled Administrative Committee (TADDAC) at the December 6, 2005 meeting.

As you are aware, the Federal Communication Commission (FCC) is currently asking for public comment concerning the issue of mandated Captioned Telephone Relay Service (known as Enhanced VCO in California). Currently captioned telephone is not a mandated service nor is it funded nationally by NECA, unlike VRS, IP relay and other TRS services that are funded at the federal level, which we believe to be the correct place for those services to be funded. Because captioned telephone service is a form of existing mandated service, we see no reason not to likewise support this as well. Some states do not have the ability to collect the funds to offer captioned telephone as a standard TRS service available to anyone who needs it. To date, the state relay programs using mostly discretionary funds have funded captioned telephone. Here in California we are currently conducting a trial distributing up to 200 phones a month to qualified users so that the Telecommunications Division can provide the Commission with a very detailed use and cost analysis of the program. TADDAC does expect to formally advise the Commission in the near future that captioned telephones become standard equipment in the California Telephone Access Program (CTAP).

TADDAC is fully aware that the CPUC does have concerns about what the cost impact of a mandated service would be to the DDTP budget and its impact on the rest of the programs DDTP operates. CPUC staff has also voiced concerns that at the present time, captioned telephone service is a sole sourced technology. While these concerns are valid, it is the view of TADDAC that these concerns will be worked out at the national level because many states have already made the same points and the FCC is well aware of them.

TADDAC would prefer for the CPUC to look beyond these issues and ask two simple questions; does captioned telephone enormously help the hearing impaired community reach closer to the idea of functional equivalency? Since the answer is a resounding YES, we at TADDAC highly recommend that the California Public Utilities Commission send an immediate letter of support for the concept of mandated caption telephone service to the FCC. One need only to go to any store selling telephones and note the variety available to hearing customers is overwhelming. Once again the issue of functional equivalency comes into play when asking the question; does the hearing impaired community have choices when using Voice Carry Over (VCO) technology? The answer is a resounding NO, and again we at TADDAC believe that mandated captioned telephone service would be another step by the federal government in filling these huge gaps in functional equivalency that are very evident.

As the closing date for taking testimony is approaching quickly, TADDAC is asking, with all due respect, that the CPUC send a letter of support for mandated captioned telephone service to the FCC as soon as possible.

Should there be any questions regarding this matter please do not hesitate to contact me.

Sincerely,

Philip H. Kaplan
Chair, TADDAC
philillini@aol.com

CC: Commissioner Michael Peevey
Commissioner Geoffrey Brown
Commissioner Dian Grueneich
Commissioner John Bohn
Jack Leutza, Director, Telecommunications Division
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